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9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION	
12	THE CENTER FOR INVESTIGATIVE	) No. 20-cv-00608-SK
13	REPORTING and AURA BOGADO,	) ) STIPULATION CONTINUING INITIAL CASE
14	Plaintiffs,	) MANAGEMENT CONFERENCE AND ORDER
15	V.	
16	UNITED STATES DEPARTMENT OF	
17	HEALTH AND HUMAN SERVICES,	)
18	Defendant.	
19		
20	United States Department of Health and Human Services ("Defendant"), through their undersigned	
21	counsel, hereby stipulate pursuant to Civil Local Rule 6-2 and 7-12, subject to the approval of the Court,	
22	that the initial case management conference ("CMC") set for February 14, 2022 at 1:30 p.m. be	
23	continued to March 14, 2022 at 1:30 p.m., with the parties' joint CMC statement due on March 7, 2022.	
24	This stipulation is based on the following facts:	
25	1. This action, filed on January 27, 2020 under the Freedom of Information Act ("FOIA"),	
26	identifies five FOIA requests directed to Defendant, dated July 10, 2019, November 27, 2019, December	
27	2, 2019, December 6, 2019, and December 17, 2019, that are the subject of this litigation. Since the	
28	filing of the lawsuit, the parties have engaged in cooperative and productive communications regarding	
	STIPULATION CONTINUING INITIAL CASE MANAGEMENT CONFERENCE AND ORDER 3:20-CV-00608-SK	

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- 2. In their prior submissions to the Court, the parties reported that they had reached an agreement that would resolve this action and were completing the final part of that agreement, *i.e.*, Defendant's review and production of significant incident reports to Plaintiffs at an agreed-upon rate. ECF No. 48 at 2. Accordingly, on December 13, 2021, the parties stipulated and respectfully requested that the Court continue their CMC from December 20, 2021 to give them time to continue this process, ECF No. 53, which the Court granted, continuing the parties' CMC until February 14, 2022, with the parties' CMC statement due by February 7, 2022. ECF Nos. 54, 55.
- 3. On December 21, 2021, Defendant completed its production of significant incident reports to Plaintiffs, and the parties have been meeting and conferring regarding whether further action is needed before they may resolve this action. In order to continue this process, the parties stipulate and respectfully request that the Court continue the CMC currently scheduled for February 14, 2022 at 1:30 p.m. until March 14, 2022 at 1:30 p.m. The parties will provide a further update to the Court regarding their progress in either a request and proposed order continuing the CMC or a joint CMC statement on or before March 7, 2022. The parties respectfully submit that this is the most efficient manner to proceed and will conserve the parties' and Court's resources.

In accordance with Civil Local Rule 5-1(h)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

19 Respectfully submitted, 20 DATED: February 7, 2022 STEPHANIE M. HINDS 21 United States Attorney 22 /s/ Savith Iyengar SAVITH IYENGAR 23 Assistant United States Attorney 24 THE CENTER FOR INVESTIGATIVE REPORTING DATED: February 7, 2022 25 /s/ D. Victoria Baranetsky 26 D. VICTORIA BARANÉTSKY 27 Attorney for Plaintiffs

STIPULATION CONTINUING INITIAL CASE MANAGEMENT CONFERENCE AND ORDER 3:20-CV-00608-SK

**ORDER** Upon the parties' request, the Court HEREBY CONTINUES the case management conference from February 14, 2022 at 1:30 p.m. until March 14, 2022 at 1:30 p.m. The parties shall file a joint case management statement by no later than March 7, 2022. IT IS SO ORDERED. wie kemi Dated: February 7, 2022 United States Magistrate Judge 

STIPULATION CONTINUING INITIAL CASE MANAGEMENT CONFERENCE AND ORDER 3:20-CV-00608-SK